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December 15, 1994

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Federal Communications Commission  
1900 M Street, N.W.  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY  
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RE: ET Docket No. 94-32

Dear Commissioners:

I am writing to offer the comments of America West Airlines ("America West") concerning the Notice of Proposed Rulemaking ("NPRM") in the above-referenced docket. In the NPRM, the Federal Communications Commission ("Commission") proposes to allocate 50 megahertz of spectrum in the 2390-2400 MHz, 2402-2417 MHz and 4660-4685 MHz bands for general Fixed and Mobile services. Previously, on August 30, 1994, In-Flight Phone Corporation ("In-Flight") had proposed to the Commission that it allocate the 2390-2400 MHz band for aeronautical audio/visual service ("AAVS"). America West believes that allocation of the 2390-2400 MHz band for AAVS is in the public interest and urges the Commission to reconsider the NPRM in order to allocate the 2390-2400 MHz band for AAVS.

Airline travel has become very commonplace in the United States, much like automobile travel. Over 400 million passengers per year fly on airlines in the U.S. During their flights, these passengers are cut off from any broadcast video and audio service. The absence of these broadcast services reflects a gap in American communications services, as Americans have come to expect live programming at any point during the day, including during travel. For instance, nearly every new automobile sold in the U.S. today is equipped with a radio providing both FM and AM broadcasts.

This gap in communications services requires the airlines to provide taped on-board audio and video programming to passengers. This on-board airline service is deficient in many respects and should be replaced by AAVS. First, and most obviously, taped programming cannot equal or duplicate live programming, as it affords no opportunity to transmit current news and other important information. A constant flow of comments from our customers indicates that the public simply is not interested in receiving dated news or other information and cannot valuably use such information when arriving at their flight destination.

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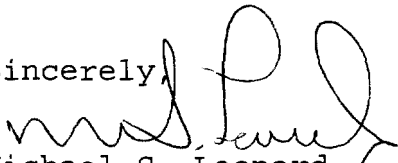
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Second, it is not cost-effective for airlines to offer taped on-board audio and video programming. The provision of on-board audio and video service requires the airlines to carry heavy electronic equipment and tapes, which add weight to our aircraft and thus increase our fuel costs. Also, we must store audio and video equipment in the passenger cabin, where available space is at a premium and could be better utilized for luggage storage or other purposes. Reducing weight and making space available in the cabin are primary objectives of all airlines, and removing the on-board electronic equipment and tapes needed to provide programming would be a significant advance in meeting these objectives. Furthermore, since much of our existing on-board video and audio equipment is becoming dated in its capabilities, the availability of the all-digital AAVS proposed by In-Flight would save us the expense of a new round of video and audio equipment purchases.

Finally, the AAVS service proposed by In-Flight offers the potential of added revenue for the airlines. The AAVS would include paid advertisements during regular programming and the resulting revenue would be split between the AAVS licensee and the airline. In addition, the AAVS would utilize state-of-the-art headsets, which would be rented to passengers and thereby generate additional revenue for the airline.

Due to increasing competition and rising public demand for better service and lower airfares, all American airlines are facing a critical period in our development. The provision of AAVS would allow us to provide enhanced services to our passengers while at the same time helping us lower fares through reduced costs and increased revenues. Accordingly, America West urges you to reconsider the NPRM in order to allocate the 2390-2400 MHz band for AAVS.

Sincerely,



Michael S. Leonard  
Director, Fleet Services  
and Onboard Product Support